## IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE

In re Chapter 11

BLANK LABEL GROUP, INC., et al., Case No. 23-10286 (JTD)

Debtors.<sup>1</sup> Jointly Administered

Obj. Deadline: July 20, 2023 at 4:00 p.m. (EDT) Hearing Date: July 27, 2023 at 3:00 p.m. (EDT)

NOTICE OF THE DEBTORS' MOTION FOR ENTRY OF AN ORDER TO SURCHARGE EXPENSES INCURRED BY THE DEBTORS IN PRESERVING AND MAXIMIZING THE VALUE OF THE DEBTORS' ASSETS AND LIMITING A POSTPETITION LIEN ON PROCEEDS PURSUANT TO 11 U.S.C. §§ 506(c) AND 552(b)

**PLEASE TAKE NOTICE** that the above-captioned debtors and debtors in possession (collectively, the "<u>Debtors</u>") filed the attached *Debtors' Motion for Entry of an Order to Surcharge Expenses Incurred by the Debtors in Preserving and Maximizing the Value of the Debtors' Assets and Limiting a Postpetition Lien on Proceeds Pursuant to 11 U.S.C. §§ 506(c) and 552 (b) (the "<u>Motion</u>").* 

PLEASE TAKE FURTHER NOTICE that objections, if any, to the Motion must (a) be in writing, (b) be filed with the Clerk of the Bankruptcy Court, 824 Market Street, 3<sup>rd</sup> Floor, Wilmington, Delaware 19801, on or before July 20, 2023, at 4:00 p.m. (EDT) (the "Objection Deadline"), and (c) served as to be received on or before the Objection Deadline upon (a) the Debtors; (b) counsel to the Debtors, Pashman Stein Walder Hayden, P.C., 1007 North Orange Street, 4<sup>th</sup> Floor, Suite 183, Wilmington, Delaware, 19899-1347, Attn: Joseph C. Barsalona II (jbarsalona@pashmanstein.com) and Richard C. Solow (rsolow@pashmanstein.com); (c) the Office of the United States Trustee for the District of Delaware, J. Caleb Boggs Building, 844 King Street, Suite 2207, Lockbox 35, Wilmington, Delaware, 19801, Attn: Jane M. Leamy (jane.m.leamy@usdoj.gov), and (d) the Subchapter V Trustee, Brown McGarry Nimeroff LLC, 919 N. Market Street, Suite 420, Wilmington, Delaware, 19801, Attn: Jami Nimeroff (jnimeroff@bmnlawyers.com).

**PLEASE TAKE FURTHER NOTICE** that only objections made in writing and timely filed and received, in accordance with the procedures above, will be considered by the Bankruptcy Court at such hearing.

PLEASE TAKE FURTHER NOTICE THAT A HEARING ON THE MOTION WILL BE HELD ON JULY 27, 2023, AT 3:00 P.M. (EDT) BEFORE THE

The Debtors in these cases, along with the last four digits of each Debtor's federal tax identification number are as follows Blank Label Group, Inc. (6183); BlackLapel Custom Clothiers, Inc. (3725); and Ratio Clothing, LLC (8330). The Debtors' mailing address is 36 Bromfield Street, 204, Boston, MA 02108.

HONORABLE JOHN T. DORSEY, AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 MARKET STREET, 5<sup>TH</sup> FLOOR, COURTROOM 5, WILMINGTON, DELAWARE 19801.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

Dated: July 13, 2023

Wilmington, Delaware

PASHMAN STEIN WALDER HAYDEN, P.C.

/s/ Joseph C. Barsalona II

Joseph C. Barsalona II (No. 6102) 1007 North Orange Street, 4<sup>th</sup> Floor, Suite 183

Wilmington, DE 19801-1242 Telephone: (302) 592-6496

Email: jbarsalona@pashmanstein.com

-and-

Richard C. Solow (admitted *pro hac vice*) The Woolworth Building 233 Broadway, Suite 820 New York, New York 10279 Email: rsolow@pashmanstein.com

Counsel to the Debtors and Debtors in Possession